

# **EXHIBIT 1**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products  
Liability Litigation,

No. 2:15-MD-02641-DGC

**[JOINT PROPOSED]  
CASE MANAGEMENT ORDER NO.**

**(Deadlines Related to *Barraza, et al. v. C. R. Bard, Inc., et al.*)**

THIS DOCUMENT RELATES TO *Barraza, et al. v. C. R. Bard, Inc., et al.*, Case No. CV-16-1374-PHX-DGC.

The Court enters the following Case Management Order regarding certain deadlines in the case *Barraza, et al. v. C. R. Bard, Inc., et al.*, Case No. CV-16-1374-PHX-DGC:

**A. Class Certification Fact Discovery**

1. Fact discovery related to class certification shall be completed no later than **January 9, 2017.**

**B. Class Certification Expert Disclosures and Discovery**

1. With respect to experts relied upon to support class certification, Plaintiffs shall provide full and complete expert disclosures and reports as required by Rule 26(a)(2)(A)-(C) of the Federal Rules of Civil Procedure no later than **January 13, 2016.**

2. With respect to experts relied upon to oppose class certification, Defendants shall provide full and complete expert disclosures and reports as required by Rule

1 26(a)(2)(A)-(C) of the Federal Rules of Civil Procedure no later than **March 10, 2017**.

2 3. With respect to rebuttal experts relied upon to support or oppose class  
3 certification, if any, the party so relying shall submit full and complete expert disclosures  
4 and reports as required by Rule 26(a)(2)(A)-(C) of the Federal Rules of Civil Procedure no  
5 later than **April 21, 2017**.

6 4. Depositions of class certification-related experts shall be completed no later  
7 than **May 31, 2017**.

8 C. Motion for Class Certification

9 1. A motion for class certification shall be filed no later than **June 19, 2017**. A  
10 response shall be filed no later than **July 21, 2017**. A reply shall be filed on **August 21,**  
11 **2017**. Such motion must comply in all respects with the Federal Rules of Civil Procedure  
12 and the Local Rules.